Case 1:12-cv-08892-SAS Document 723 Filed 06/15/15 Page 1 of 2

## Giuliano McDonnell & Perrone, LLP

New Jersey Office 2001 U.S. Highway 46 Suite 104 Parsippany, NJ 07054

Tel: (973) 302-0120 Fax: (973) 302-0121

Please Reply to Long Island

Long Island Office

170 Old Country Road, Suite 608 Mineola, New York 11501

Tel: (516) 214-8448 Fax: (516) 414-7905

New York City Office

237 West 35<sup>th</sup> St, Suite 706 New York, New York 10001 Tel: (646) 328-0120

Fax: (646) 328-0121 www.gmplawfirm.com Florida Office

6615 W. Boynton Beach Blvd. No. 351

Boynton Beach, FL 33437 Tel: (561) 337-8816

Fax: (561) 337-4653

Joseph J. Perrone, Esq. jperrone@gmplawfirm.com

June 15, 2015 Via ECF

Honorable Shira A. Scheindlin United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Courtroom 15C New York, New York 10007-1312 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:

DATE FILED: 6 Mg/15

Re:

In Re M/V MSC FLAMINIA Case No: 12-cv-8892 (SAS)(FM)

Our File: E400

Dear Judge Scheindlin:

Giuliano McDonnell & Perrone, LLP represents Deltech Corporation ("Deltech") in the matter noted above. On June 10, 2015, we submitted a request for permission to file amended crossclaims against Mediterranean Shipping Company ("MSC"). On June 11, 2015, your Honor granted Deltech's request and ordered Deltech to file the amended crossclaims in the form in which they appear as attached to our June 10, 2015 letter.

We are writing today because it has come to our attention that the proposed amended pleading that we attached to our June 10, 2015 letter does not comport with the April 17, 2014 stipulation dismissing Deltech's claims against "the relevant Cargo Claimants." (See, Docket Entry No.: 478.) To rectify that oversight, we respectfully request your Honor's permission to file the slightly altered version of the proposed amended pleading, wherein all claims against Cargo Claimants have been removed, which is attached.

Should any questions or concerns arise, please do not hesitate to contact the undersigned. Thank you kindly for your Honor's attention to this matter.

## Case 1:12-cv-08892-SAS Document 725 Filed 06/16/15 Page 2 of 2

Case 1:12-cv-08892-SAS Document 723 Filed 06/15/15 Page 2 of 2

Hon. Shira A. Scheindlin

Case No.: 12-cv-8892 (SAS)(FM)

June 15, 2015

Page 2

Respectfully yours, Giuliano McDonnell & Perrone, LLP

Joseph J. Herrone

Encl.

Via ECF and Electronic Mail See attached service list. Cc: